ADDENDUM TO THE FACT SHEET FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. WA-005079-2

I. GENERAL INFORMATION

Public Utility District No. 1 of Chelan County Rocky Reach Hydroelectric Project Wastewater Treatment Facility P.O. Box 1231 Wenatchee, WA 98801

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on August 1, 2003, and accepted by the Department on August 4, 2003. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for the Rocky Reach Hydroelectric Project Wastewater Treatment Facility and discharge monitoring reports (DMRs) were reviewed and they indicate no change in the treatment characteristics of the effluent process or volume of wastewater have occurred. Under WAC 173-203-140 the treatment plant based on the size will continued to be classified by the Department as Type I requiring a Type I operator.

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PUD NO. 1 OF CHELAN COUNTY ROCKY REACH HYDROELECTRIC PROJECT EXPIRATION DATE: DECEMBER 31, 2008

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III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to the Rocky Reach Hydroelectric Project Wastewater Treatment Facility for the discharge of wastewater to the Columbia River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The fact sheet and application lists no existing or proposed industrial users, as the plant serves only the dam. The Permitee has indicated a desire to decommission the treatment works by the end of 2004 and at said time will petition the Department to cancel its' NPDES permit. The permit is expected to install a septic system, which will fall under the regulatory authority of the Chelan-Douglas Health District.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet adequately addressed conditions and issues at the facility at the time when the previous permit was issued. The Department has not received any information during the course of the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

There are no changes necessary to the previous permit conditions based on the following tables. The Department will however require the Permittee to provide Ammonia-Nitrogen values in mg/L and to calculate these values based on flow into lbs/Day.

Table 1 depicts the effluent characterization as reported this permit term for the period June 2001 to June 2203. Table 1 demonstrates that aside from a major upset occurring in August of 2002 the plant is capable of discharging good quality effluent on a consistent basis.

Table 1 Effluent Characterization Compared to Permit Limits and Past Effluent Characterizations

Parameter	Limits		Cumulative Average	Lowest Monthly Average	Highest Monthly Average
1 at affecter	Avg. Monthly ¹	Avg. Weekly ²	2001-2003	2001-2003	2001-2003
Flow (MGD)	Max. Daily ³ 0.004		0.0011	0.001	0.0046 4
BOD (mg/L)	30	45	24.1 (7.9)	5	397.4 ⁴ (22.8)
TSS (mg/L)	30	45	110.0 ⁵ (12.1)	5	2367.3 ⁴ (21.9)
Residual Chlorine (mg/L)	2	2	0.60	0.31	0.875
Fecal Coliform	200 per 100 mL	400 per 100 mL	21.1	1	467 ⁵ (4.6)
pН	6 to 9 stan	dard units	NA	4 ⁶	8.1

¹ The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

² The average weekly effluent limitation is defined as the highest allowable average of daily discharge values over a set of seven (7) consecutive calendar days, calculated as the sum of all daily discharge values measured during a set of seven (7) calendar days divided by the number of daily discharge values measured during that set of calendar days.

³ The maximum daily effluent limitation is defined as the highest allowable discharge during a calendar day.

⁴Occurred in January of 2002. Violation attributed to a leaking water heater contributing to the flow.

⁵ 110 mg/L value includes the month of August 2002 where TSS was reported to be 2367.3 mg/L caused by system upset. The number in parenthesis represents the two year average without the month of August 2002 factored in.

⁶Occurred in June 2001. Attributed to a pH meter failure causing a inaccurate low reading.

Table 2 is a direct comparison of the influent parameters reported this current permit term, 1998 to 2003, against the design criteria. Plant loading is well below that of the design capacity.

Table 2 Influent Characterization Compared to Plant Design Criteria

Parameter	Design Criteria	Influent
Maximum Monthly Average Flow in	0.004	Maximum Monthly Average
Gallons per Day (GPD)	V.VV 4	Flow 0.0023
BOD Influent Loading	6.7 lbs/Day	Average Monthly
	6.7 lbs/Day	1.33 lbs/Day
TSS Influent Leading	6.7 lbs/Day	Average Monthly
TSS Influent Loading	6.7 lbs/Day	0.82 lbs/Day

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - <u>Public Involvement</u> for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be reauthorized for five years or until the plant is decommissioned, whichever comes first.

APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 16, 2003 in the Wenatchee World to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on September 29, 2003 in the Wenatchee World to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below.

Water Quality Permit Coordinator Department of Ecology Central Regional Office 15 West Yakima Avenue, Suite 200 Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (509) 457-7105, or by writing to the address listed above.

This Addendum to the Fact Sheet was written by Richard Marcley.

APPENDIX B -- RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.